STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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Dirk Kempthorne, Governor
C. Stephen Allred, Director

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OFFICE OF AIR QUALITY

January 20, 2004

Jan Hastings, Director of Office of Air Quality
US EPA Region 10
1200 Sixth Ave.
Seattle WA 98101

Subject: $PM_{2.5}$ Designations and 8-hour Design Values for the State of Idaho

Dear Ms. Hastings,

Enclosed on behalf of the Governor, is the state of Idaho's attainment recommendations for the 8-hour ozone National Ambient Air Quality Standard. This submittal is in response to Administrator Iani's December 3, 2003 request to Governor Kempthorne for submittal of final recommendations and 8-hour ozone design values by January 23, 2004.

The state of Idaho recommends that the entire state, except for tribal lands, be designated "attainment/unclassifiable". The enclosed analysis of ozone monitoring for the 3-year period of 2001-2003 shows that all monitored areas of the state met the eight-hour standard. This is the same recommendation that was proposed to EPA in 2002, prior to completion of the 2003 ozone-monitoring season. The 2003 ozone data has been validated and submitted to the AQS database.

Idaho's ozone season is listed in the Federal Register as April through October. Idaho Department of Environmental Quality staff has submitted documentation to your staff demonstrating that Idaho's ozone season should be May through September, and your staff has concurred with this analysis. Idaho's ozone season will be formally changed through the Federal Register process, by EPA staff. Our documentation is enclosed with this letter.

In the future, should it be necessary to redesignate an area as "nonattainment", we intend to evaluate the appropriate EPA guidance and any other relevant considerations to determine presumptive boundaries for that area, rather than default to MSA or County boundaries.

If you have any questions about our recommendations or data provided, please contact me at (208) 373-0240, or Martin Bauer, Air Quality Division Administrator, at (208) 373-0552.

Sincerely,

C. Stephen Allred
Director

CSA:BL:jml

Enc: (3)

c: Martin Bauer, Air Quality Division Administrator, DEQ
Katherine Kelley, Boise Regional Office Administrator, DEQ
Jim Yost, Senior Policy Advisor, Office of the Governor

State of Idaho 8-hour Ozone Designations Recommendations
Based on 2001-2003 Design Values

Airshed	Site ID	Site Name	2001-2003 Design Value (ppm)[2]	Attainment?	Recommended Designation[3]
Boise City-Nampa MSA[1]	160010030	Whitney Elementary School	0.08	Yes	Attainment/Unclassifiable
Elmer County	160390010	251 W. Tilli Road	0.07	Yes	Attainment/Unclassifiable
Rest of State (no monitoring data available)					Attainment/Unclassifiable

NOTES:
1. The Federal Office of Management and Budget defines metropolitan area boundaries. The Boise City-Nampa MSA includes Ada, Canyon, Owyhee, Gem and Boise Counties.
2. The design value is compared to the standard of 0.08 ppm.
3. EPA does not make a distinction between attainment designations and unclassifiable designations since the Clean Air Act treats attainment and unclassifiable areas in the same way.

State of Idaho 8-hour Ozone Design Values

Based on 3-year average of 4th highest daily maximum values for 2001-2003

Airshed	Site ID	Site Name	Percent Valid Days[2]	4th Highest Daily Maximum (ppm) 2001	2002	2003	3-Year Average (ppm)[3]	2001-2003 Design Value (ppm)
Boise City-Nampa MSA[1]	160010030	Whitney Elementary School	97	0.076	0.081	0.073	0.08	0.08
Elmore County	160390010	251 W. Tilli Rd.	94	0.069	0.071	0.065	0.07	0.07

NOTES:
1. The Federal Office of Management and Budget defines metropolitan area boundaries. The Boise City-Nampa MSA includes Ada, Canyon, Owyhee, Gem and Boise Counties.
2. Percent Valid Days. The design value is based on 3 consecutive calendar years of data where daily maximum 8-hour concentrations are available for 75% of the days each ozone-monitoring season (May 1 through September 30), and 90% of the days for the 3-year period for which it is determined.
3. The 3-year average of the 4th highest daily maximum is compared to the standard of 0.08 ppm after rounding the average to two decimal places. If the third decimal place is 4 or less, it is rounded down. If the third decimal place is 5 or larger, it is rounded up.

Ozone Monitoring Season In the Treasure Valley, Idaho

The Idaho Department of Environmental Quality (DEQ) began monitoring ambient ozone concentrations in the Treasure Valley (Boise) area in May, 2000. Two monitors were established. The Whitney School monitor is located in the southeast portion of Boise. The Simco Road Monitor is located approximately 20 miles down wind, to the south and east of the City of Boise. A third monitor was added in 2002, located in Middleton, approximately 20 miles northwest of Boise.

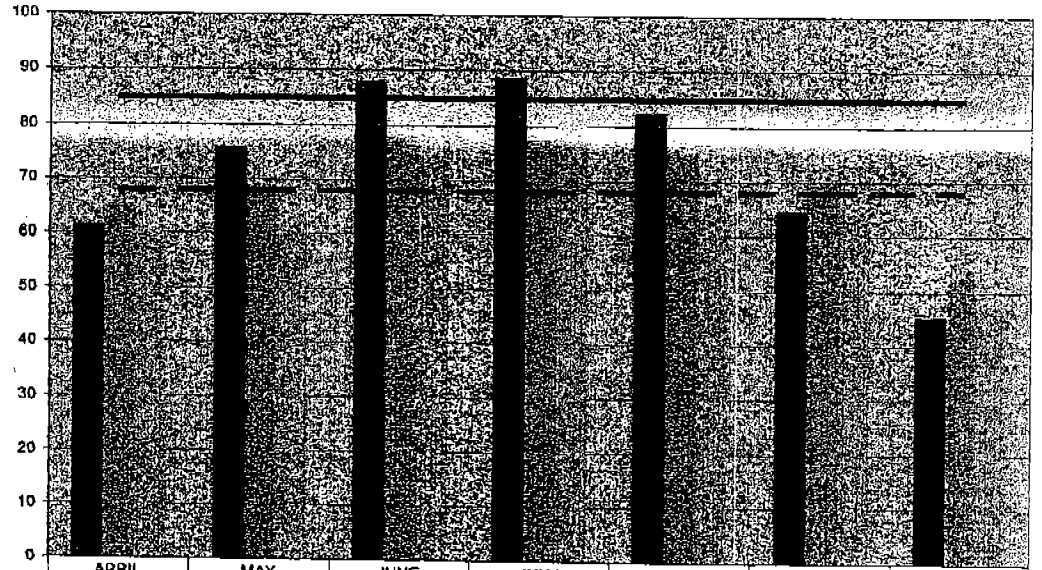
The ozone season for this area was established as the summer months from the beginning of April through the end of October. Due to the late start date, the first year of monitoring data is incomplete. A full season of monitoring data was obtained during the 2001 and 2002 ozone seasons, and are considered in this analysis.

An analysis of the maximum ozone concentration measurements gathered each month during the 2001 and 2002 ozone monitoring seasons shows that ozone levels remain fairly low in April and October, but do become elevated during the hotter months during the middle of summer.

DEQ technical staff feel that ambient ozone concentrations should be monitored during any month when the maximum recorded concentrations reached 80 percent of the standard or higher. For months when the maximum recorded concentrations remained below 80 percent of the standard, DEQ technical staff believe that monitoring of ozone levels is unnecessary.

Based on this analysis, DEQ technical staff recommend that the ozone monitoring season for southwest Idaho be modified to include only the months May, June, July, August and September. The likelihood of elevated concentrations occurring during months of April and October is low, and these months may safely be omitted from our monitoring season.

Maximum Ozone Values per Month



	APRIL	MAY	JUNE	JULY	AUG	SEPT	OCT
Whitney	62	76	88	89	83	65	45
Simco	65	69	78	78	75	69	53
Middleton	60	62	74	81	65	63	47
Standard	85	85	85	85	85	85	85
80% of Standard	68	68	68	68	68	68	68